



U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street
New York, NY 10007

March 31, 2025

*So ordered
4-3-25
R. Hellerstein*

BY ECF

The Honorable Alvin K. Hellerstein
United States District Court
United States District Judge
500 Pearl Street
New York, NY 10007

Re: *Knight First Amendment Institute at Columbia University v. U.S. Department of State*, No. 23 Civ. 02513 (AKH)

Dear Judge Hellerstein:

We write on behalf of Defendant the United States Department of State (the “State Department” or the “Government”) and Plaintiff the Knight First Amendment Institute at Columbia University (the “Institute”) to provide a status update in the above-referenced Freedom of Information Act (“FOIA”) lawsuit.

As the parties advised in their last joint status report, filed on January 31, 2025 (ECF No. 32), the State Department has completed its processing of records in response to the Institute’s FOIA request. Since the filing of that report, the parties have met and conferred to discuss some of the Government’s withholdings. The Government is in the process of taking a closer look at certain withholdings identified by Plaintiff, and is preparing a draft *Vaughn* index for those withholdings identified by Plaintiff to help inform further discussions. The Parties propose filing the next status report by May 30, 2025, to advise the Court as to whether any issues remain for the parties or the Court to resolve.

We thank the Court for its attention to this matter.

Respectfully,

MATTHEW PODOLSKY
Acting United States Attorney

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